



June 23, 2026

Mr. Gerald Crossley

Via Email: opra+request-92256-10fb5c6e@requests.opramachine.com
gacrossley@msn.com

RE: Open Public Records Act Request Dated June 11, 2026

Dear Mr. Crossley,

On behalf of Township Clerk Andrea T. McVeigh, who is currently out of the office, please accept this correspondence as the Township's response to your Open Public Records Act ("OPRA") request dated June 11, 2026, in which you seek records under both OPRA and the common law right of access.

Please be advised that your request is being partially fulfilled, partially denied, and partially extended, as set forth below.

Request #1: *All legal invoices, billing statements, and payment records related to the Township's payment of legal fees for the Township Manager in connection with any lawsuit, claim, or legal action filed from January 1, 2020 to present.*

The Township is providing copies of invoices and purchase orders paid for legal fees related to the defense of the matter captioned *Independent Fire Company #1, Andrew Simonsick Sr., et al. v. State of New Jersey, Department of Community Affairs, Township of Maple Shade, Susan Danson, et al.*, filed under Docket No. BUR-L-2105-23.

Additionally, attached is correspondence prepared by Township Solicitor Eileen Fahey, Esq., on behalf of the Township Council authorizing payment of the above-referenced legal fees.

These records fulfill this portion of your request.

Request #4: *All settlement agreements, releases, or court orders related to the matter(s), including but not limited to any documents determining liability, wrongdoing, or slander.*

The Township is providing a copy of the *Order Dismissing Plaintiffs' Punitive Damage Claims in Third Amended Verified Complaint Against Defendant Susan Danson*, dated November 3, 2025, and signed by the Honorable Judge Ferrelli.

This record fulfills this portion of your request.



Request #2: *All indemnification or defense obligation determinations made by the Township, Township Solicitor, Joint Insurance Fund (JIF), or any insurer regarding the Township Manager in the above referenced matter(s).*

The Township requires additional time to review potentially responsive records. The requested documents, if any, may involve communications with legal counsel, insurance carriers, claims administrators, and the Joint Insurance Fund and may contain information protected from disclosure by the attorney-client privilege, attorney work product doctrine, common interest privilege, insurance claim privileges, and other exemptions under the New Jersey Open Public Records Act and applicable law.

Accordingly, the Township respectfully invokes an extension of thirty (30) days to permit consultation with legal counsel, the Joint Insurance Fund, and any applicable insurance representatives to identify responsive records and determine whether any records, or portions thereof, are exempt from disclosure.

The Township anticipates providing a response to this portion of your request on or before **July 23, 2026**.

This extension is made without waiver of any objections, privileges, exemptions, or defenses available to the Township under OPRA, the common law right of access, or any other applicable law.

Requests #3 and #5: *Any findings, determinations, or communications regarding the Township Manager's actions and all emails, memos, or correspondence between the Township Council, Township Manager, Township Solicitor, or Joint Insurance Fund.*

To the extent responsive records exist, they are exempt from disclosure pursuant to the New Jersey Open Public Records Act because they consist of attorney-client privileged communications, attorney work product, and materials prepared in connection with pending litigation. Such records are exempt from disclosure pursuant to N.J.S.A. 47:1A-1.1 and applicable common law privileges.

Additionally, OPRA does not require a public agency to create records, provide legal conclusions, or answer interrogatory-style questions where no existing government record responsive to the request exists.

Accordingly, this portion of your request is **denied**.



If you have any questions regarding this response, please contact the Township Clerk's Office.

Sincerely,

Andrea T. McVeigh, RMC
Township Clerk

By: _____

Gayle Gillan Deputy Municipal Clerk
On Behalf of the Township Clerk